

**Robert W. Krueger**  
*President and Chief Executive Officer*

February 6, 2006

P.O. Box 1298  
250 Broad Street  
Hawkinsville, GA 31036  
478.783.4001

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

DOCKET NO. 06-36

**Re: EB-06-TC-060**  
**EB Docket No. 06-36**  
**CPNI Compliance Certification**  
**COMSOUTH TELECOMMUNICATIONS, INC.**

Dear Ms. Dortch:

This filing is intended to respond to the Commission's directive to file on or before February 6, 2006, ComSouth Telecommunications, Inc. ("Company") Customer Proprietary Network Information ("CPNI") Compliance Certification.

It is our policy to protect the confidential CPNI of our customers, other telecommunications carriers, and equipment manufacturers and we believe, in good faith, that our efforts have advanced this underlying objective. A copy of our company policy is enclosed. We periodically review this with appropriate company personnel to insure strict compliance.

When responding to the Commission's recent Public Notice, DA 06-223 (Jan. 30, 2006), the Company undertook a review of our CPNI practices. As a result of this review, we have identified steps that will assist the Company's continuing compliance with CPNI. Accordingly, the Company submits the attached Certification. In this Certification, the Company, in good faith, attests that the Company has implemented actions to ensure compliance. Attached to this filing is a Company Policy and Operating Guidelines that the Company is utilizing in this process.

We note at this point that the Company takes seriously its obligation to protect the confidential nature of its CPNI, and we are unaware of any of our activities that are connected with recently publicized "brokering" activities that would implicate, contemplate, or otherwise compromise the confidentiality of our customers' CPNI.

The undersigned may be contacted should you have any questions or require additional information.

Respectfully submitted,

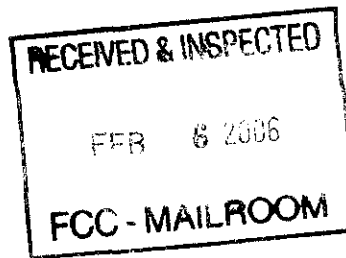
  
Robert W. Krueger  
President & CEO

RWK/aj

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**ComSouth**  
**Telecommunications**

**Robert W. Krueger**  
*President and Chief Executive Officer*



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**Re: EB-06-TC-060**  
**EB Docket No. 06-36**  
**Certification of CPNI Filing, February 6, 2006**  
**COMSOUTH TELECOMMUNICATIONS, INC.**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 06-223 (Jan. 30, 2006), attached please find ComSouth Telecommunications, Inc.'s Certification of CPNI Filing and the accompanying descriptive statement as required by Section 64.2009 of the Commission's Rules.

The undersigned can be contacted should you have any questions or require additional information.

Sincerely,

  
Robert W. Krueger  
President & CEO

RWK/aj

**ComSouth**  

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**Telecommunications**

RECEIVED & INSPECTED

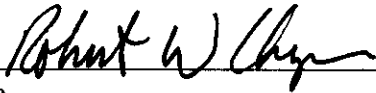
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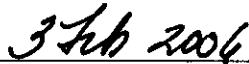
## ANNUAL CERTIFICATION

I, ROBERT W. KRUEGER, President & CEO of ComSouth Telecommunications, Inc. do hereby declare under penalties of perjury and in accordance with 47 CFR 64.2009(e) that the Company is in compliance with the FCC Rules as set forth at 47 CFR 64, Subpart U. This information is true and accurate to the best of my knowledge, information, and belief.

Signature



Date



FEB 6 2006

FCC - MAILROOM

## **COMSOUTH TELECOMMUNICATIONS, INC.**

### **STATEMENT OF COMPANY POLICY**

*When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of ComSouth Telecommunications, Inc.,*

ComSouth Telecommunications, Inc. (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- ! Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.
- ! CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.
- ! Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released *only* in the circumstances as set forth in the Company's CPNI Operating Guidelines.

**The release of any CPNI by sales personnel must be authorized by a supervisor.**

**The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 CFR 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.**